

IN THE DISTRICT COURT OF THE VIRGIN ISLANDS  
DIVISION OF ST. CROIX

NICOLE WOOTEN,

Plaintiff,

v.

LIMETREE BAY TERMINALS d/b/a  
OCEAN POINT TERMINALS, PORT  
HAMILTON REFINING AND  
TRANSPORTATION, and WEST  
INDIES PETROLEUM, LTD.,

Defendants.

Case No. 1:23-CV-00012

**ACTION FOR DAMAGES**

**JURY TRIAL DEMANDED**

**NOTICE OF 30(B)(6) DEPOSITION OF  
TOTAL SAFETY VIRGIN ISLANDS LLC—IN PERSON**

TO:

Donnie King  
201 East Las Olas Boulevard, Suite 1800  
Fort Lauderdale, FL 33301

Reginald E. Janvier, Esq.  
201 East Los Olas Boulevard, Suite 1800  
Fort Lauderdale, FL 33301  
Attorney for Limetree Bay Terminals, LLC d/b/a Ocean Point Terminals

Andrew C. Simpson  
2191 Church Street, Suite 5  
Christiansted, VI 00820  
Attorney for Port Hamilton Refining and Transportation Port Hamilton  
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Ryan C. Stutzman Esq.  
1138 King Street  
Suite 100  
Christiansted, VI 00820  
Attorney for West Indies Petroleum, Ltd.



**EXHIBIT**

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Charles E. Lockwood Esq.  
Dudley Newman Feuerzeig, LLP  
1131 King Street  
Suite 204  
Christiansted, VI 00820  
Attorney for Total Safety

Yvonne Setorie  
Elite Reporting Services  
elitereportingsvcs@gmail.com

**PLEASE TAKE NOTICE** that pursuant to Federal Rule of Civil Procedure 30(b)(6) Plaintiff, by and through undersigned counsel, will take the oral examination of **TOTAL SAFETY VIRGIN ISLANDS LLC**. Defendant shall designate one or more officers, directors or managing agents who are competent to testify on the company's behalf.

That person(s) who is designated to testify on Defendant's behalf should have knowledge of, but not be limited to, the following:

1. The content of all communications and persons with knowledge of the smoldering coke incident on or about July and August 2022.
2. The instructions, directives, maps, placement of air quality monitoring devices, the calibration of all air quality monitoring devices, the set up of the air quality monitoring devices, which compounds were tested for using the air quality monitoring devices related to the smoldering coke incident on or about July and August 2022, and who gave those instructions and directives, and who would set up, calibrate, and who determined which compounds to test for.
3. The content of and findings of all data extractions of air quality data/reports related to the smoldering coke incident on or about July and August 2022, and what those findings indicated and what actions were taken as a result.
4. The substance of all meeting minutes and notes related to the smoldering coke incident on or about July and August 2022, and who attended those meetings and who took the minutes and the notes.
5. What policies and procedures were in place in 2022 related to air quality monitoring and air monitoring equipment rentals to LBT and PHRT.

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6. The names of the persons who are employees for Total Safety that are also on the Emergency Response Team in 2022, and what their duties were and what actions they took.
7. The substance of all meeting minutes of the Emergency Response Team from July to August 31, 2022 related to the coke smoldering and what actions were taken as a result of these meetings.
8. The facts related to the requests by Limetree Bay Terminals, PHRT, or any other company that works for the refinery and/or terminals for the rental of any fire equipment and/or air quality monitors related to the smoldering coke from July to August 2022.
9. The content of and persons with knowledge of all records for the rental of fire equipment and air quality monitors by Limetree Bay Terminals, PHRT, Limetree Bay Refining, or other companies from 2019 to the present.
10. Knowledge of all actions taken by Total Safety during the coke smoldering on or about July and August 2022, in chronological order including who took what actions when and why.
11. The content and persons with knowledge of all video and photographs taken of the smoldering incident on or about July and August 2022, and who they were and why they were taken.
12. The history of your involvement with PHRT and/or LBT and/or LBR, the scope of work, the requirements to do the work, including pay, what equipment was provided, what was it used for, and did the amount of equipment vary and if so, how, when, and why?

This deposition will take place on **August 1, 2025 at 9:00 a.m. AST** at **Lee J. Rohn and Associates 56 King Street, 3<sup>rd</sup> Floor (Hamilton House) Christiansted VI 00820** before any Notary Public commissioned by the Territory of the US Virgin Islands or other person qualified to administer the oath and take deposition.

This deposition is being taken for use as evidence and/or trial purposes and may be continued from day to day until completed. This deposition may be recorded by

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stenographic, voice, and/or audio/video means. If the deposition officer is attending remotely, the parties agree to the remote administration of the oath.

RESPECTFULLY SUBMITTED  
LEE J. ROHN AND ASSOCIATES, LLC  
Attorneys for Plaintiff

DATED: July 17, 2025

BY: /s/ Robin P. Seila

Robin P. Seila, Esq.

VI Bar No. R2043

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U.S. Virgin Islands 00820

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**CERTIFICATE OF SERVICE**

**THIS IS TO CERTIFY** that on July 17, 2025, I emailed the notice to the following:

Donnie King  
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Fort Lauderdale, FL 33301

Attorney for **Limetree Bay Terminals, LLC d/b/a Ocean Point Terminals**

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